

AMENDMENTS TO THE DRAWINGS

Figure 1 has been amended as required. Corrected drawings in compliance with 37 CFR 1.121(d) have been attached.

REMARKS

The Applicants respectfully request further examination and consideration in view of the amendments above and the arguments set forth fully below. Claims 1-38 were previously pending in this application. Within the Office Action, Claims 1-38 have been rejected. By the above amendments, Claims 1, 2, 9, 15, 21, 29, 30, 33, 36 and 37 have been amended. Accordingly, Claims 1-38 are currently pending.

Objections to the Drawings

Within the Office Action, Figure 1 has been objected to because it was not labeled "Prior Art." By the above amendments, the drawings are now in compliance. Furthermore, no new matter has been added.

Objections to the Claims

Within the Office Action, Claims 1, 2, 9, 15, 21, 30, 33 and 37 have been objected to because of informalities. By the above amendments, the claims are now in compliance. Specifically, Claims 1, 2, 9, 15, 30, 33 and 37 have been amended as suggested within the Office Action. Within Claim 21, "the" has been added before "content data" as suggested; however, Applicants respectfully feel that changing "a network device" to "an external device" is unnecessary and the Claims are sufficiently clear as worded. Furthermore, no new matter has been added.

Rejections Under 35 U.S.C. § 101

Within the Office Action, Claims 27-37 have been rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants respectfully disagree.

The independent Claim 27 is directed to a method of synchronizing data between two network devices. The method of Claim 27 comprises sending first update information to a content directory service from an interface layer regarding a first new content data received by a first media device from a second media device during content data synchronization performed by a synchronization application and sending second update information to the synchronization application from the interface layer regarding a second new content added to the first media device, wherein the second new content data is synchronized with the second media device

during a next content data synchronization. Applicants respectfully disagree that Claim 27 does not produce a useful, concrete and tangible result. As shown, the method of Claim 27 produces a result of synchronized data on two devices. This is clearly a useful, concrete and tangible result.

Claims 28-31 are dependent on the independent Claim 27, and as described above, Claim 27 teaches patentable subject matter within the scope of 35 U.S.C. §101. Accordingly, Claims 28-31 are therefore allowable as being dependent on an independent allowable claim.

The independent Claim 32 is directed to a method of synchronizing data between two network devices. The method of Claim 32 comprises performing data synchronization between a first media server and a second media server, receiving content data related to the data synchronization on the first media server, obtaining update information related to the received content data from a synchronization application on the first media server, providing the update information to a content directory service of the first media server and updating the content directory service according to the update information. Applicants respectfully disagree that Claim 27 does not produce a useful, concrete and tangible result. As shown, the method of Claim 27 produces a result of synchronized data on two devices. This is clearly a useful, concrete and tangible result.

Claims 33-37 are dependent on the independent Claim 32, and as described above, Claim 32 teaches patentable subject matter within the scope of 35 U.S.C. §101. Accordingly, Claims 33-37 are therefore allowable as being dependent on an independent allowable claim.

Rejections Under 35 U.S.C. § 102

Within the Office Action, Claims 1-38 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0194309 to Carter (“hereinafter Carter”). Applicants respectfully disagree.

In particular, within the Office Action, Claims 5, 12, 18, 24 and 35 have also been rejected under 35 U.S.C. § 103 because “Carter discloses all of the claim limitations of 1, 8, 15, 21, 27, and 32 as explained above except for disclosure of the media server is a Universal Plug and Play enabled device and the content directory service is a Universal Plug and Play content directory service.” [Office Action, Page 10] Since 35 U.S.C. § 102 requires all of the claim limitations to be taught, and it is recognized within the Office Action, that at least this claim limitation is not taught, then Claims 5, 12, 18, 24 and 35 cannot be rejected under 35 U.S.C. § 102.

Furthermore, Carter teaches a system and method for synchronizing a multiplicity of devices in a multimedia environment which includes a multimedia device, a multimedia database, a portable multimedia player, a personal computer and a master digital multimedia device. [Carter, Figure 1] The multimedia database is an online collection of audio and video works. [Carter, Paragraph 28] The recorded multimedia works are able to be categorized by format. [Carter, Paragraph 28] The multimedia environment also includes a control unit which provides a means to select and play a multimedia work via keys and commands for operations such as start, stop, skip, repeat, shuffle and save, and a display to display information about a selected work. [Carter, Paragraph 30] A user is able to select desired multimedia works to be synchronized and downloaded for storage on a digital multimedia device from the music multimedia database. [Carter, Paragraph 31] However, Carter does not teach a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database. Carter also does not teach an interface layer coupled to communicate with the synchronization application and the content directory service to provide update information to the content directory service regarding new content data received by the database from the external device during the content data synchronization. Similarly, Carter does not teach the methods of synchronizing data as claimed herein.

In contrast to the teachings of Carter, the present invention is directed towards a content directory and synchronization bridge. A first media server is coupled to one or more devices. The first media server includes a database to store content. The first media server also includes a Content Directory Service (CDS), a synchronization application, and a synchronization-CDS bridge. The synchronization-CDS bridge acts as an interface layer between the synchronization application and the CDS. The synchronization application provides data synchronization communications using one or more conventional synchronization protocols.

The synchronization application enables a data synchronization process between the first media server and a web site, a remote media server, a PDA or another device. During the data synchronization process, new content is received from the remote media server by the first media server, and the new content is stored in the database within the first media server. As the new content is received by the database, the synchronization application keeps a record of the new content received. The synchronization-CDS bridge searches the synchronization application for any newly added content sent to the database. Information related to any new content discovered by the synchronization-CDS bridge is sent by the synchronization-CDS bridge to the CDS as update information. The CDS is updated according to the update information received from the

synchronization-CDS bridge, so that the CDS accurately reflects all content in the database, including the newly added content, subsequent to the data synchronization. Data synchronization between the first media server and the web site, and between the first media server and the PDA or other device is performed in a similar manner as described above. [Present Specification, page 11, line 6 through page 12, line 6] Carter does not teach a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database. Carter also does not teach an interface layer coupled to communicate with the synchronization application and the content directory service to provide update information to the content directory service regarding new content data received by the database from the external device during the content data synchronization. Carter does not teach the methods of synchronizing data as claimed herein.

The independent Claim 1 is directed to a media server. The media server of Claim 1 comprises a database to store content data, a synchronization application to perform content data synchronization with an external device, a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database and an interface layer coupled to communicate with the synchronization application and the content directory service to provide update information to the content directory service regarding new content data received by the database from the external device during the content data synchronization. As described above, Carter does not teach a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database. Carter also does not teach an interface layer coupled to communicate with the synchronization application and the content directory service to provide update information to the content directory service regarding new content data received by the database from the external device during the content data synchronization. For at least these reasons, the independent Claim 1 is allowable over the teachings of Carter.

Claims 2-7 are dependent on the independent Claim 1. As discussed above, the independent Claim 1 is allowable over Carter. Accordingly, Claims 2-7 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 8 is directed to a media server. The media server of Claim 8 comprises a database to store content data, a synchronization application to perform content data synchronization with an external device, a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database and an interface layer coupled to communicate with the synchronization application and

the content directory service to provide update information to the synchronization application regarding new content added to the database, wherein the new content data is synchronized with the external device during a next content data synchronization. As described above, Carter does not teach a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database. Carter also does not teach an interface layer coupled to communicate with the synchronization application and the content directory service to provide update information to the synchronization application regarding new content added to the database, wherein the new content data is synchronized with the external device during a next content data synchronization. For at least these reasons, the independent Claim 8 is allowable over the teachings of Carter.

Claims 9-14 are dependent on the independent Claim 8. As discussed above, the independent Claim 8 is allowable over Carter. Accordingly, Claims 9-14 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 15 is directed to a media server. The media server of Claim 15 comprises a database to store content data, a synchronization application to perform content data synchronization with an external device, a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database and an interface layer coupled to communicate with the synchronization application and the content directory service to provide first update information to the content directory service regarding new content data received by the database from the external device during the content data synchronization, and to provide second update information to the synchronization application regarding the new content data added to the database, wherein the new content data is synchronized with the external device during a next content data synchronization. As described above, Carter does not teach a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database. Carter also does not teach an interface layer coupled to communicate with the synchronization application and the content directory service to provide first update information to the content directory service regarding new content data received by the database from the external device during the content data synchronization, and to provide second update information to the synchronization application regarding the new content data added to the database, wherein the new content data is synchronized with the external device during a next content data synchronization. For at least these reasons, the independent Claim 15 is allowable over the teachings of Carter.

Claims 16-20 are dependent on the independent Claim 15. As discussed above, the independent Claim 15 is allowable over Carter. Accordingly, Claims 16-20 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 21 is directed to a network of devices. The network of devices of Claim 21 comprises a network device, a first media server coupled to the network device, the first media server including a database to store content data, a synchronization application to perform content data synchronization with the network device, a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database and an interface layer coupled to communicate with the synchronization application and the content directory service to provide first update information to the content directory service regarding new content data received by the database from the network device during content data synchronization, and to provide second update information to the synchronization application regarding the new content data added to the database, wherein the new content data is synchronized with the network device during a next content data synchronization. As described above, Carter does not teach a content directory service to browse the content data stored in the database and to provide information regarding the content data stored in the database. Carter also does not teach an interface layer coupled to communicate with the synchronization application and the content directory service to provide first update information to the content directory service regarding new content data received by the database from the network device during content data synchronization, and to provide second update information to the synchronization application regarding the new content data added to the database, wherein the new content data is synchronized with the network device during a next content data synchronization. For at least these reasons, the independent Claim 21 is allowable over the teachings of Carter.

Claims 22-26 are dependent on the independent Claim 21. As discussed above, the independent Claim 21 is allowable over Carter. Accordingly, Claims 22-26 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 27 is directed to a method of synchronizing data between two network devices. The method of Claim 27 comprises sending first update information to a content directory service from an interface layer regarding a first new content data received by a first media device from a second media device during content data synchronization performed by a synchronization application and sending second update information to the synchronization application from the interface layer regarding a second new content added to the first media

device, wherein the second new content data is synchronized with the second media device during a next content data synchronization. As described above, Carter does not teach sending first update information to a content directory service from an interface layer regarding a first new content data received by a first media device from a second media device during content data synchronization performed by a synchronization application. Carter also does not teach sending second update information to the synchronization application from the interface layer regarding a second new content added to the first media device, wherein the second new content data is synchronized with the second media device during a next content data synchronization. For at least these reasons, the independent Claim 27 is allowable over the teachings of Carter.

Claims 28-31 are dependent on the independent Claim 27. As discussed above, the independent Claim 27 is allowable over Carter. Accordingly, Claims 28-31 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 32 is directed to a method of synchronizing data between two network devices. The method of Claim 32 comprises performing data synchronization between a first media server and a second media server, receiving content data related to the data synchronization on the first media server, obtaining update information related to the received content data from a synchronization application on the first media server, providing the update information to a content directory service of the first media server and updating the content directory service according to the update information. As described above, Carter does not teach providing the update information to a content directory service of the first media server. Carter also does not teach updating the content directory service according to the update information. For at least these reasons, the independent Claim 32 is allowable over the teachings of Carter.

Claims 33-37 are dependent on the independent Claim 32. As discussed above, the independent Claim 32 is allowable over Carter. Accordingly, Claims 33-37 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 38 is directed to an apparatus for synchronizing data between two network devices. The apparatus of Claim 38 comprises means for performing data synchronization between a first media server and a second media server, means for receiving content data related to the data synchronization on the first media server, means for obtaining update information related to the received content data from a synchronization application on the first media server, means for providing the update information to a content directory service of

the first media server and means for updating the content directory service according to the update information. For at least these reasons, the independent Claim 38 is allowable over the teachings of Carter.

Rejection of Claims Under 35 U.S.C. § 103

Within the Office Action, Claims 5, 12, 18, 24, 28 and 35 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Carter in view of U.S. Patent No. 6,892,230 to Gu et al. (hereinafter Gu). Applicants respectfully disagree.

Claim 5 is dependent on the independent Claim 1. Claim 12 is dependent on the independent Claim 8. Claim 18 is dependent on the independent Claim 15. Claim 24 is dependent on the independent Claim 21. Claim 28 is dependent on the independent Claim 27. Claim 35 is dependent on the independent Claim 32. As discussed above, the independent Claims 1, 8, 15, 21, 27 and 35 are allowable over the teachings of Carter. Accordingly, Claims 5, 12, 18, 24, 28 and 35 are all also allowable as being dependent on an allowable base claim.

For at least the reasons given above, the Applicants respectfully submit that the claims are in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,

HAVERSTOCK & OWENS LLP

Dated: Tue.1,2007

By: Jonathan O. Owens

Jonathan O. Owens

Reg. No. 37,902

Attorneys for Applicants



Annotated Sheet

1/5

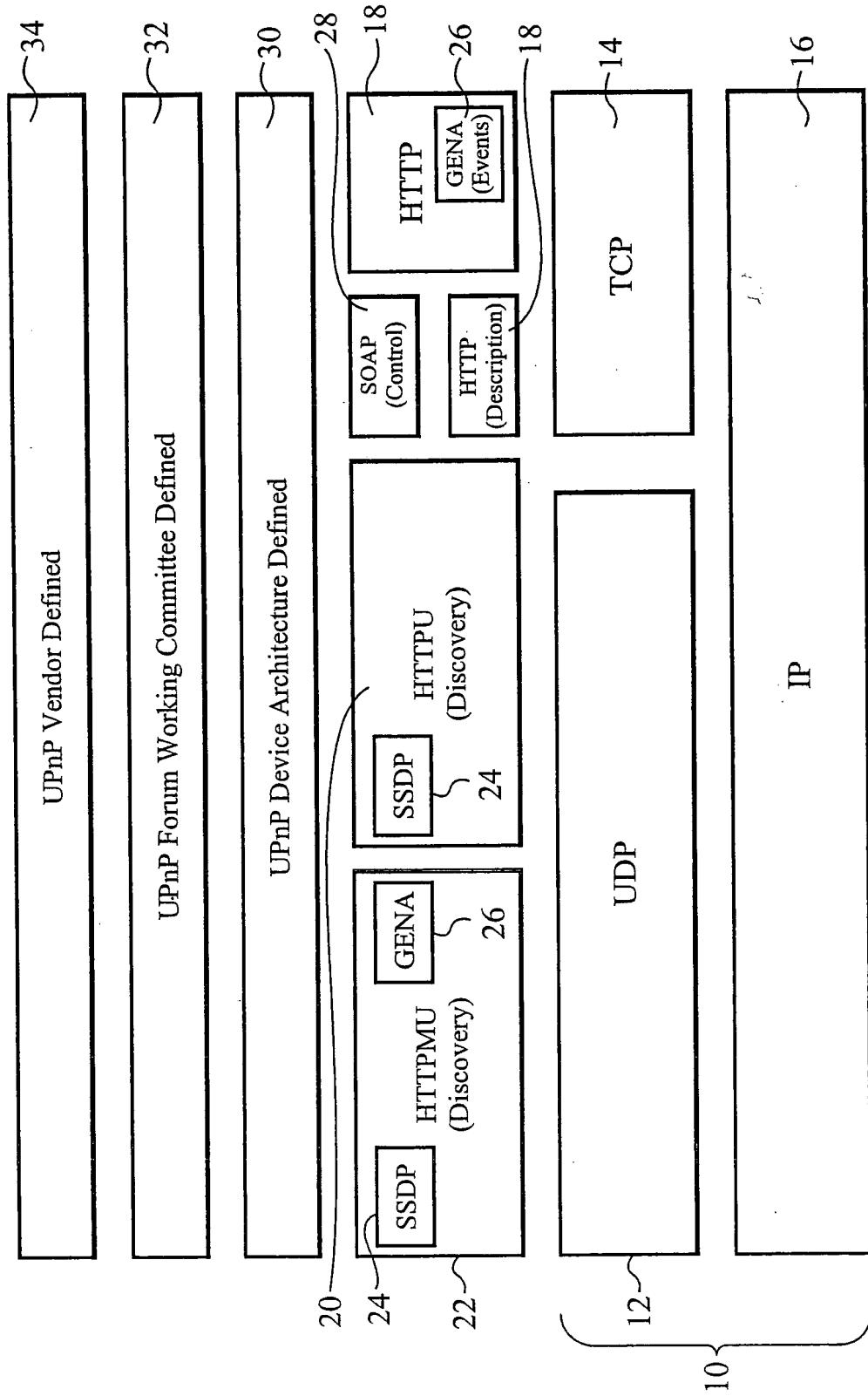


Fig. 1
(PRIOR ART)